

**Exhibit A**

**(Proposed Order)**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>MONTCO OFFSHORE, INC., <i>et al.</i>,<sup>1</sup></b>  <b>Debtors.</b>	<b>§</b> <b>§</b> <b>§</b> <b>§</b> <b>§</b> <b>§</b>	<b>Case No. 17-31646</b>  <b>Chapter 11</b>  <b>(Jointly Administered)</b>
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**ORDER REGARDING MEDIATION**

Upon the oral motion (the “Motion”) of counsel for the official committee of unsecured creditors (the “Committee”) for the above-captioned debtors (the “Debtors”) in the above-captioned chapter 11 cases, on the record of the hearing held on December 12, 2017 (the “Hearing”) for an order directing mediation; and the Court having granted the Motion on the record of the Hearing; and the Debtors and the Committee having selected Mr. Tom Kirkendall, Esq. to mediate the matters described on the record of the Hearing (the “Dispute”).

**NOW, THEREFORE, IT IS HEREBY ORDERED THAT:**

1. As requested by the parties, the Dispute is referred to Mr. Tom Kirkendall, Esq. (the “Mediator”) for mediation.
2. Mediation shall take place on Tuesday, December 19, 2017 at 9:00 a.m. (Central Time) at the law offices of Porter Hedges LLP, 1000 Main Street, 36th Floor, Houston, TX 77002.
3. Mediation shall be conducted in such manner as designated by the Mediator, after consultation with the parties.

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<sup>1</sup> The debtors in these chapter 11 cases (collectively, the “Debtors”), together with the last four (4) digits of each Debtor’s federal tax identification number, are Montco Offshore, Inc. (1448) and Montco Oilfield Contractors, LLC (9886). The mailing address for the Debtors, solely for the purposes of notices and communications, is 17751 Hwy 3235, Galliano, Louisiana 70354.

4. A representative of each of the following parties having the necessary authority to settle the Dispute, together with counsel, shall appear at the mediation: (i) the Debtors; (ii) the Committee; (iii) the lenders under the Debtors' first-lien credit facility and debtor-in-possession financing facility; (iv) Mr. Lee Orgeron; (v) Alliance Energy Services, LLC; (vi) Aqueos Corporation; (vii) Bollinger Shipyards LLC; (viii) C&G Welding, Inc.; (ix) Oceaneering International Inc.; (x) Odyssey Marine, Inc.; and (xi) Oil States Skagit Smatco, LLC. Additional parties and their counsel are permitted, but not required, to attend, at the discretion of the Committee or the Mediator.

5. The reasonable fees and expenses of the Mediator shall be paid when due as administrative expenses of the Debtors' estates, without further order from this Court.

Dated: December \_\_\_, 2017  
Houston, Texas

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**THE HONORABLE MARVIN ISGUR**  
**UNITED STATES BANKRUPTCY JUDGE**